

1. **Fact Discovery - Interim Deadlines.**
 - a. The parties must complete at least five of the identified depositions per side (for a total of at least 10 depositions) by **January 17, 2025**.
2. **Fact Discovery - Final Deadline.** All discovery, other than expert discovery and requests for admission, must be completed by **January 31, 2025**.

3. **Obligation to Supplement.** Supplemental disclosures under Fed. R. Civ. P. 26(e) shall be made promptly after the receipt of information by the party or counsel and, in any event, no later than the completion of fact discovery, unless good reason can be shown for why such information was not available.
4. **Expert Discovery.**
 - a. Plaintiff's and Counter-plaintiff's trial experts must be designated, and the information required by Fed. R. Civ. P. 26(a)(2) must be disclosed for these experts, by **February 14, 2025**.
 - b. Defendant's and Counter-defendant's trial rebuttal experts must be identified by **February 28, 2025**.
 - c. Defendant and Counter-defendant must provide the additional information required by Fed. R. Civ. P. 26(a)(2) for trial rebuttal experts by **March 21, 2025**.
 - d. Expert depositions must be completed by **April 18, 2025**.
5. **Dispositive Motions.**
 - a. Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by **May 9, 2025**.
 - b. Oppositions to dispositive motions must be filed by **June 6, 2025**.
 - c. Replies in further support of dispositive motions may be filed by **June 20, 2025**.
6. **Daubert Motions.**
 - a. Daubert motions must be filed by **May 9, 2025**.
 - b. Oppositions to Daubert motions must be filed by **June 6, 2025**.

Procedural Provisions

1. **Extension of Deadlines.** All requests to extend or modify deadlines must be made by motion and must state: (1) the original date(s); (2) the number of previous requests for adjournment or extension; (3) whether these previous

requests were granted or denied; (4) the reasons for the requested extension; and (5) whether the opposing party consents and, if not, the reasons given for refusing to consent. The motion shall also contain a summary of the discovery, if any, that remains to be taken, and a specific date when the requesting party expects to complete the additional discovery, join other parties, amend the pleadings, or file a motion. Motions to extend or modify deadlines will be granted only for good cause shown. If the requested extension or modification affects any other scheduled dates, a represented party must submit a proposed revised scheduling order using this template. (A pro se party may, but is not required to, submit a proposed revised scheduling order.) Absent an emergency, any request for an extension or adjournment shall be made at least forty-eight hours prior to the deadline or scheduled appearance.

2. **Early Resolution of Issues.** The Court recognizes that, in some cases, resolution of one or more preliminary issues may remove a significant impediment to settlement or otherwise expedite resolution of the case. Counsel are encouraged to identify any such issues and to make appropriate motions at an early stage in the litigation.
3. **Motions to Compel or Prevent Discovery.** Except for good cause shown, motions to compel discovery, motions for protective orders, motions to quash, motions to strike discovery responses, and similar motions must be filed no later than seven days after the close of fact discovery or the close of expert discovery, whichever deadline is relevant. If additional discovery is compelled by the court after the relevant deadline has passed, the court may enter such additional orders relating to discovery as may be appropriate.

IT IS SO ORDERED.

October 18, 2024

/s/ Indira Talwani
United States District Judge